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July 23, 2020

BY ECF

Honorable Roanne L Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Tess v. City of New York, et al.*, 18-CV-6542 (KAM) (RLM)

Your Honor:

I am the attorney for plaintiffs. I write, with the consent of defense counsel, to request an extension of discovery, *nunc pro tunc*, from July 14¹ until September 4, 2020 in order to complete depositions. To date, the depositions of the plaintiff, four defendants, and a 30(b)(6) witness have been taken. Five depositions remain to be taken.

These depositions have not occurred due to the various health and logistical issues created by the Covid-19 virus. It is my understanding that police officers are now available to be deposed.

I apologize for the lateness of this request and appreciate Your Honor's consideration.

Sincerely,

/s

Robert Marinelli

cc: ACC Angarad Wilson, Esq.

¹ Discovery was scheduled to end on July 14.